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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Case No.: 2:23-cv-00288-APG-DJA

Plaintiff,

vs.

**STIPULATED MOTION TO
EXTEND TIME FOR DEFENDANT
SHINDERMAN TO RESPOND TO
THE SEC'S MOTION FOR SUMMARY
JUDGMENT**

MARKMAN BIOLOGICS CORP. and ALAN SHINDERMAN,

(First Request)

Defendant,

and

ASPEN ASSET MANAGEMENT SERVICES, LLC

Relief Defendant

Defendant Alan Shinderman (“Mr. Shinderman”), through undersigned counsel of record, and Plaintiff Securities and Exchange Commission (“Plaintiff”), through their undersigned counsel of record, hereby stipulate and agree as follows:

1. On May 15, 2025, Plaintiff filed its Motion for Summary Judgment (ECF No. 99) including 48 exhibits. The deadline for Mr. Shinderman to file a response to the motion for summary judgment pursuant to LR 7-2(b) is 21 days after service of the motion making it due by June 5, 2025.

2. This deadline overlaps with trial preparation by Mr. Shinderman's counsel for a trial

1 scheduled to begin on a June 2025 stack and needs additional time to review and prepare a
2 response to the SEC's motion for summary judgment.

3 3. On May 19, 2025, the parties met for a conference and agreed to a 14-day
4 extension for Mr. Shinderman to file his response to the SEC's motion for summary judgment
5 making the new deadline due on June 19, 2025.

6 4. This motion is Mr. Shinderman's first request for an extension of time to respond
7 to the SEC's motion for summary judgment and is being submitted in good faith.

8
9 STIPULATED AND AGREED TO:
10 Dated this 22nd day of May, 2025

11 By: /s/ Ross C. Goodman
12 Ross C. Goodman, Esq.
13 Goodman Law Group
14 520 S. 4th Street, 200
15 Las Vegas, NV 89101
16 *Attorney for Defendant Alan
Shinderman*

17
18 By: /s/Edward J. Reilly
19 Edward J. Reilly Esq.
20 Derek Bentsen, Esq.
21 Ada Fernandez Johnson, Esq.
22 Katherine H. Stella, Esq.
23 100 F Street, NE
24 Washing DC 20549
25 *Attorneys for Plaintiff Securities
and Exchange Commission*

26 IT IS SO ORDERED:

27 Dated: May 27, 2025



28 ANDREW P. GORDON
29 CHIEF UNITED STATES DISTRICT JUDGE